

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Mary R.	BK NO. 23-10530 AMC
Mulvihill	Debtor(s)	Chapter 13
PNC Bank, National Association	Movant	Related to Document 41
vs.		
Mary R. Mulvihill	Debtor(s)	
Kenneth E. West,	Trustee	

**RESPONSE TO DEBTOR’S MOTION TO SELL PROPERTY PURSUANT TO
SECTION 363 OF THE BANKRUPTCY CODE**

PNC Bank, National Association enters its response to the Debtor’s Motion to Sell Property Pursuant to Section 363 of the Bankruptcy Code.

1. Creditor’s loan is secured by a mortgage on Debtor’s property at 1313 Bradford Ct., Phoenixville, PA 19460.
2. Creditor would not object to the sale so long as the Order entered is clear that the sale is not free and clear of secured creditors lien and same shall remain on the property until such time that it is paid in full.

WHEREFORE, the Movant, PNC Bank, National Association, prays that the Court enters an Order requiring the Secured Creditor to be paid in full.

Respectfully submitted,

Date: February 21, 2024

/s/ Michael P. Farrington
Michael P. Farrington, Esquire
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IN RE: Mary R. Mulvihill

Debtor(s)

PNC Bank, National Association

Movant

vs.

Mary R. Mulvihill

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Kenneth E. West,

Trustee

BK NO. 23-10530 AMC

Chapter 13

Related to Doc 41

**CERTIFICATE OF SERVICE
RESPONSE TO DEBTOR'S MOTION TO SELL PROPERTY**

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on February 22, 2024, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Mary R. Mulvihill
1313 Bradford Court
Phoenixville, PA 19460

Attorney for Debtor(s) (via ECF)

SHARON S. MASTERS
132 Overleaf Drive
Thorndale, PA 19372

Trustee (via ECF)

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Method of Service: electronic means or first-class mail.

Dated: February 22, 2024

/s/ Michael P. Farrington

Michael P. Farrington Esq.
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